

**FILED**

MAR 08 2016

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature]  
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

RAMON RODRIGUEZ, JR (1)

aka "Bacon"

ELIAS MENDOZA (2)

aka "Big E"

ELIODORO DENOVA LOPEZ (3)

JOEL JAIMES DENOVA (4)

GABRIEL RANGEL (5)

JOSE SALOMON (6)

KENNETH MONTGOMERY (7)

aka "Wege"

NORA TIJERINA (8)

OSCAR RODRIGUEZ (9)

THOMAS LEE (10)

CAPRI ROLLINS (11)

ATILANO FELIPE GARCIA (12)

CRYSTAL BECK DIGGS (13)

DANA ICE (14)

aka "Hodde"

DOUGLAS JUNIOR TAYLOR (15)

JONATHAN SALAZAR (16)

KEVIN KUEHNLE (17)

MICHAEL ARTHUR (18)

TAWUAN STEWART (19)

aka "Gator"

RODNEY JEROME (20)

## Defendants

CRIMINAL NO.

W16CR068

## INDICTMENT

[VIO: COUNT ONE: 21 U.S.C. 846 {21 U.S.C. 841(a)(1) & 841(b)(1)(A); 21 U.S.C. 841(a)(1) & 841(b)(1)(B); 21 U.S.C. 841(a)(1) & 841(b)(1)(C)} – Conspiracy to Possess With Intent to Distribute Methamphetamine, a Schedule II Controlled Substance; COUNT TWO: 21 U.S.C. 846 {21 U.S.C. 841(a)(1) & 841(b)(1)(C)} – Conspiracy to Possess with Intent to Distribute Cocaine, a Schedule I Narcotic Drug Controlled Substance; COUNT THREE: 21 U.S.C. 846 {21 841(a)(1) & 841(b)(1)(D)} – Conspiracy to Possess With Intent to Distribute Marijuana, a Schedule I Controlled Substance; COUNT FOUR, COUNT FIVE, COUNT SIX, COUNT SEVEN and COUNT EIGHT: 21 U.S.C. 843(b) – Unlawful Communications; COUNT NINE: 18 U.S.C. 924(c)(1)(A)(i) – Possession of a Firearm During the Commission of a Drug Trafficking Crime;]

THE GRAND JURY CHARGES:

**COUNT ONE**

**[21 U.S.C. 846 {21 U.S.C. 841(a)(1) & 841(b)(1)(A);  
21 U.S.C. 841(a)(1) & 841(b)(1)(B); 21 U.S.C. 841(a)(1) & 841(b)(1)(C)}]**

Beginning on or about January 1, 2013, the exact date unknown to the Grand Jury, and continuing until the present time, in the Western District of Texas and elsewhere, Defendants,

**RAMON RODRIGUEZ, JR, aka "Bacon,"  
ELIAS MENDOZA, aka "Big E,"  
ELIODORO DENOVA LOPEZ,  
JOEL JAIMES DENOVA,  
GABRIEL RANGEL,  
NORA TIJERINA,  
CAPRI ROLLINS,  
ATILANO FELIPE GARCIA,  
CRYSTAL BECK DIGGS,  
DANA ICE, aka "Hodde"  
JONATHAN SALAZAR,  
KEVIN KUEHNLE,  
MICHAEL ARTHUR,  
and  
RODNEY JEROME,**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other and others, to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess with intent to distribute a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1).

**QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY**

The quantity of the mixture or substance containing methamphetamine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY	STATUTE
<b>RAMON RODRIGUEZ, JR, (1)</b> aka "Bacon,"	At least 500 grams	21 U.S.C. § 841(b)(1)(A)
ELIAS MENDOZA (2) aka "Big E"	At least 500 grams	21 U.S.C. § 841(b)(1)(A)
ELIODORO DENOVA LOPEZ (3)	At least 500 grams	21 U.S.C. § 841(b)(1)(A)
JOEL JAIMES DENOVA (4)	At least 500 grams	21 U.S.C. § 841(b)(1)(A)
GABRIEL RANGEL (5)	At least 50 grams	21 U.S.C. § 841(b)(1)(B)
NORA TIJERINA (8)	At least 500 grams	21 U.S.C. § 841(b)(1)(A)
CAPRI ROLLINS (11)	At least 50 grams	21 U.S.C. § 841(b)(1)(B)
ATILANO FELIPE GARCIA (12)		21 U.S.C. § 841(b)(1)(C)
CRYSTAL BECK DIGGS (13)		21 U.S.C. § 841(b)(1)(C)
DANA ICE aka "Hodde" (14)	At least 50 grams	21 U.S.C. § 841(b)(1)(B)
JONATHAN SALAZAR (16)	At least 50 grams	21 U.S.C. § 841(b)(1)(B)
KEVIN KUEHNLE (17)		21 U.S.C. § 841(b)(1)(C)
MICHAEL ARTHUR (18)	At least 50 grams	21 U.S.C. § 841(b)(1)(B)
RODNEY JEROME (20)		21 U.S.C. § 841(b)(1)(C)

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
**[21 U.S.C. 846 {21 U.S.C. 841(a)(1) & 841(b)(1)(C)}]**

Beginning on or about January 1, 2013, the exact date unknown to the Grand Jury, and continuing until the present time, in the Western District of Texas and elsewhere, Defendants,

**RAMON RODRIGUEZ, JR, aka "Bacon,"**  
**ELIAS MENDOZA, aka "Big E,"**  
**ELIODORO DENOVA LOPEZ,**  
**JOEL JAIMES DENOVA,**  
**KENNETH MONTGOMERY,**  
**DOUGLAS JUNIOR TAYLOR,**  
and  
**TAWUAN STEWART,**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed and with each other and others, to the Grand Jury known and unknown, to commit offenses the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess with intent to distribute a mixture or substance containing a detectable

amount of Cocaine, a Schedule I Narcotic Drug Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**  
**[21 U.S.C. 846 {21 U.S.C. 841(a)(1) & 841(b)(1)(D)}]**

Beginning on or about January 1, 2013, the exact date unknown to the Grand Jury, and continuing until the present time, in the Western District of Texas and elsewhere, Defendants,

**RAMON RODRIGUEZ, JR, aka "Bacon,"**  
**ELIAS MENDOZA, aka "Big E,"**  
**ELIODORO DENOVA LOPEZ,**  
**JOEL JAIMES DENOVA,**  
**JOSE SALOMON**  
**OSCAR RODRIGUEZ**  
**and**  
**THOMAS LEE**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other and others, to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess with intent to distribute a mixture or substance containing a detectable amount of Marijuana, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**  
**[21 U.S.C. 843(b)]**

On or about December 9, 2015, in the Western District of Texas, the Defendant,

**RAMON RODRIGUEZ,**

did unlawfully, knowingly and intentionally use a communication facility, to-wit: a telephone, to facilitate the commission of an act constituting a felony under Title 21, United States Code, Section 841(a)(1), to-wit: Distribution of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 843(b).

**COUNT FIVE**  
**[21 U.S.C. 843(b)]**

On or about August 5, 2015, in the Western District of Texas, the Defendant

**ELIAS MENDOZA,**

did unlawfully, knowingly and intentionally use a communication facility, to-wit: a telephone, to facilitate the commission of an act constituting a felony under Title 21, United States Code, Section 841(a)(1), to-wit: Distribution of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 843(b).

**COUNT SIX**  
**[21 U.S.C. 843(b)]**

On or about November 25, 2015, in the Western District of Texas, the Defendant,

**ELIODORO DENOVA LOPEZ,**

did unlawfully, knowingly and intentionally use a communication facility, to-wit: a telephone, to facilitate the commission of an act constituting a felony under Title 21, United States Code, Section 841(a)(1), to-wit: Distribution of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 843(b).

**COUNT SEVEN**  
**[21 U.S.C. 843(b)]**

On or about December 9, 2015, in the Western District of Texas, the Defendant,

**JOEL JAIMES DENOVA**

did unlawfully, knowingly and intentionally use a communication facility, to-wit: a telephone, to facilitate the commission of an act constituting a felony under Title 21, United States Code, Section 841(a)(1), to-wit: Distribution of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 843(b).

**COUNT EIGHT**  
**[21 U.S.C. 843(b)]**

On or about December 5, 2015, in the Western District of Texas, the Defendant,  
**THOMAS LEE,**  
did unlawfully, knowingly and intentionally use a communication facility, to-wit: a telephone, to facilitate the commission of an act constituting a felony under Title 21, United States Code, Section 841(a)(1), to-wit: Distribution of Marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 843(b).

**COUNT NINE**  
**[18 U.S.C. 924(c)(1)(A)(i)]**

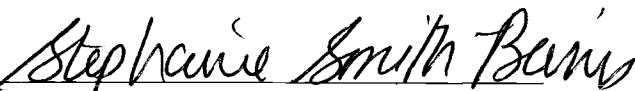
On or about January 26, 2016, in the Western District of Texas, Defendant,  
**JOSE SALOMON,**  
did knowingly possess the following firearm, to-wit:  
  
An Armas Erbi S.C.I., 12 gauge shotgun, bearing Serial Number 27066;  
  
in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to-wit: *Conspiracy to Possess with the Intent to Distribute Marijuana*, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL:

**SEALED DOCUMENT PURSUANT  
TO E-GOVERNMENT ACT OF 2002**

\_\_\_\_\_  
FOREPERSON

RICHARD L. DURBIN, JR.  
UNITED STATES ATTORNEY

  
By: STEPHANIE SMITH-BURRIS  
Assistant United States Attorney